July 12, 2026

Submitted electronically via www.regulations.gov

The Honorable Russell T. Vought
Director, Office of Management and Budget
Executive Office of the President
725 17th Street NW
Washington, DC 20503

Dear Director Vought:

The International Society for Computational Biology (ISCB) appreciates the opportunity to comment on the Office of Management and Budget's proposed revisions to the Uniform Guidance for Federal Financial Assistance (Docket OMB-2026-0034).

ISCB is the world's leading professional society for computational biology and bioinformatics, with more than 4,500 members (~40% in the United States) representing researchers at the intersection of biology, artificial intelligence, computer science, mathematics, statistics, engineering, and medicine. Our members are leaders in artificial intelligence and its application to biology and medicine; we develop the mathematical models, computational methods, biological databases, machine learning algorithms, and analytical frameworks that power 21st century biomedical research, biotechnology, precision medicine, agriculture, environmental science, and public health. Multiple recent Nobel Prizes were awarded to computational biologists, showing the importance and impact of our field on modern biology and medicine.

Although we find merit in OMB's stated goals of accountability, transparency, responsible stewardship of taxpayer resources, and rigorous scientific oversight, we are concerned by the specific proposed actions. Moreover, in our judgment, several of the proposed revisions would weaken rather than strengthen the collaborative scientific enterprise that has made federally funded American research the international standard for excellence.

Several effects of the proposed rule would unintentionally disrupt that ecosystem by introducing uncertainty into research funding, limiting scientific collaboration, restricting dissemination of scientific discoveries, reducing investment in the next generation of computational scientists, adding administrative burden to both researchers and the government, and diminishing access to the computational infrastructure (e.g., machine learning models, databases, and software) upon which modern biology and medicine increasingly depend. Because computational biology has become the foundation of biotechnology and AI-enabled life sciences, these changes will endanger the U.S. standing as leaders in biology, medicine, and artificial intelligence.

The United States has achieved global leadership in these areas because of its top universities, generous support for doctoral student training, and approaches to research funding that recognize the importance of expert peer review. The ISCB membership trains the next generations of scientific talent, especially in AI for biology, who conduct the basic research that fuels the nation's biotechnology and AI sectors. From the perspective of national competitiveness, it is essential to continue to support US universities to maintain a healthy scientific ecosystem.

We have specific concerns about the following proposed changes.

- **§ 200.205.** This provision would require political review before discretionary awards are issued, reducing the significance of expert peer review. Although ISCB supports appropriate federal oversight of research funding and recognizes the important role of agencies in ensuring responsible stewardship of public resources, we believe that **there is already appropriate federal oversight through the highly successful peer-review system,** federal agencies, and then from Congress. Thus we assert that additional oversight is unnecessary. We also assert that **scientific merit should remain the primary basis upon which research awards** are made. Maintaining a transparent, merit-based review process strengthens public confidence while encouraging investigators to pursue the innovative research that has made the United States the global leader in science and technology.
- **§ 200.340.** This would authorize agencies to terminate awards if they no longer align with evolving agency priorities or the national interest. Computational biology, like other fields, requires stability in funding to pursue both short-term and long-term research studies; without reliable funding, research projects will be focused on safe outcomes rather than potentially exciting breakthroughs that can improve American health and maintain US leadership in science.
- **§§ 200.202(e) and 200.220.** This provision could discourage routine international scientific collaboration that presents little risk while providing substantial scientific benefit. Computational biology depends upon access to globally distributed biological data, shared software development, international benchmarking efforts, and multinational scientific expertise. This provision will reduce the ability of computational biologists to do effective, important, and high-impact research. ISCB recognizes the importance of protecting research security and addressing legitimate national security concerns, and considers existing disclosure requirements and targeted safeguards to provide a sufficient role in protecting federally funded research.
- **§§ 200.205 and 200.300.** This provision could create uncertainty for training programs that prepare future computational scientists. Federal training programs have been instrumental in building this workforce by supporting doctoral students, postdoctoral researchers, interdisciplinary education, and collaborative research experiences. Long-term American leadership in biotechnology depends upon developing a highly skilled workforce capable of integrating biological and computational sciences. Policies that unintentionally reduce opportunities for scientific training or discourage participation in interdisciplinary research will ultimately reduce the nation's capacity for innovation.
- **§§ 200.405 and 200.432.** This provision would significantly restrict the allowability of publication costs and scientific conference participation. For computer science researchers in general, and computational biologists in

particular, the most important research findings are published in conference proceedings rather than journals; hence, attendance at scientific conferences is essential to achieving and maintaining scientific standing and research excellence. Moreover, these scientific meetings bring together computational scientists, experimental biologists, clinicians, engineers, and industry researchers to validate new computational methods, establish community standards, benchmark artificial intelligence models, and develop collaborative software resources. Many of today's most widely used biological databases, open-source software projects, and international data standards originated through collaborations established at scientific conferences. Reducing allowability of scientific conference attendance costs will directly reduce USA research productivity and international standing. Similarly, reducing allowed publication costs will affect the ability to publish in high impact journals and hence hurt scientific standing for our researchers whose careers depend on journal publications. ISCB respectfully recommends retaining the longstanding principle that publication and conference costs remain allowable when they are reasonable, necessary, and directly related to the objectives of the award.

- **§ 200.405 (Access to Scientific Knowledge Is Essential Research Infrastructure).** If institutional subscriptions to scientific journals and comparable research resources become categorically unallowable under this proposal, this would hurt all researchers, but especially those at smaller institutions, who would lose access to the literature and data resources necessary to conduct high-quality computational research. The consequence would not simply be fewer subscriptions: it would reduce reproducibility, slow scientific progress, and diminish the return on federal investments in research. In turn, this will make the US research community less competitive on the international stage.

In summary, ISCB believes OMB can achieve its goals of accountability, transparency, and responsible stewardship while preserving the scientific ecosystem that has made the United States the global leader in computational biology, biotechnology, and biomedicine. We respectfully encourage OMB to revise the proposed provisions to preserve merit-based scientific review, provide stability for long-term research investments, support responsible international collaboration, strengthen the future scientific workforce, and maintain the scholarly infrastructure necessary for scientific discovery.

ISCB appreciates the opportunity to provide these comments and welcomes continued engagement with OMB as it considers revisions to the proposed rule.

Respectfully submitted,

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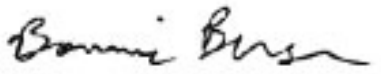

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